

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MISSOURI

MAURICE ROBINSON, and deceased wife
BOBBIE ROBINSON,

Plaintiff,

v.

REGIONAL MEDICAL CENTER AT MEMPHIS;
UNIVERSITY OF TENNESSEE owner of
U.T. BOWLD HOSPITAL; DR. CHAN SUDCLIN;
DR. ABBAS CHAMSMDAIN; DR. KEITH MERRILL;
UT MEDICAL GROUP, INC.; UT MEDICAL GROUP,

Defendants.

CASE NO: 15-395

SUGGESTIONS IN OPPOSITION OF REGIONAL ONE HEALTH
TO PLAINTIFF’S SECOND MOTION FOR RECONSIDERATION

Defendant, Shelby County Healthcare Corporation d/b/a Regional One Health, misnomered by Plaintiff as Regional Medical Center at Memphis (hereinafter defendant “Regional One”), in opposition to Plaintiff’s Second Motion for Reconsideration, hereby reasserts and stands on arguments and authorities set forth previously in its Suggestions in Opposition to Plaintiff’s first Motion for Reconsideration, and adopts the reasons articulated by the Court in its December 7, 2015 Order denying same. Plaintiff has failed to present evidence, new or otherwise, sufficient to support the requested relief.

WHEREFORE, for the forgoing reasons outlined above, and set forth in the Court’s December 7th Order, Defendant Shelby County Healthcare Corporation d/b/a Regional One

Health respectfully requests this Court's Order denying Plaintiff's Second Motion for Reconsideration, and for such further relief as the Court deems just and proper.

Respectfully submitted,

POLSINELLI PC

/s/ Travis L. Salmon

Travis L. Salmon

MO #53090

M. Tony Patton

MO#52572

900 W. 48th Place, Suite 900

Kansas City, MO 64112

(816) 395-0658

(816) 753-1536 Fax

tsalmon@polsinelli.com

tpatton@polsinelli.com

Attorney for Defendant Shelby County Healthcare Corporation d/b/a Regional One Health

CERTIFICATE OF SERVICE

I hereby certify that I have on this 17th day of December, 2015 served a true and correct copy of the foregoing upon the following individuals via the Court's Electronic Case Filing

System:

Maurice Robinson
9315 Fainwood Drive
Kansas City, MO 64138

/s/ Travis L. Salmon

Attorney for Defendant